

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

YOON DOELGER, and
PETER DOELGER,

Plaintiffs,

vs.

JPMORGAN CHASE BANK, N.A., and
CHICKASAW CAPITAL MANAGEMENT,
LLC,

Defendants.

No. 1:21-cv-11042-AK

Leave To File Granted On
September 7, 2023

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants JPMorgan Chase Bank, N.A. ("JPMC") and Chickasaw Capital Management, LLC ("Chickasaw" and collectively, "Defendants") respectfully move for summary judgment in their favor on all Counts of the complaint filed by Plaintiffs Yoon Doelger and Peter Doelger ("Plaintiffs") on June 23, 2021 (Docket No. 1) (the "Complaint"). As grounds for this Motion, Defendants rely upon and incorporate by reference: (a) the arguments contained in the supporting Memorandum; (b) the declaration of Tracy O. Appleton and the exhibits thereto; and (c) Defendants' Statement of Material Facts Not in Dispute.

In conjunction with this Motion, Defendants are filing herewith:

1. Defendants' Memorandum of Law in Support of their Motion for Summary Judgment;
2. Declaration of Tracy O. Appleton and associated exhibits; and
3. Defendants' Statement of Material Facts Not In Dispute.

WHEREFORE, Defendants respectfully request that the Court enter summary judgment in favor of Defendants on all Counts of the Complaint.

Dated: September 28, 2023

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Tracy O. Appleton, hereby certify that this document filed through the CM/ECF system was served electronically to the registered participants as identified on the Notice of Electronic Filing on September 28, 2023, and that paper copies will be sent to those indicated as non-registered participants on September 28, 2023.

/s/ Tracy O. Appleton
Tracy O. Appleton